

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

AGREED MOTION FOR EXTENSION OF TIME TO FILE PROTECTIVE ORDER

Plaintiff and Defendant in the above-referenced case hereby move for an extension of the deadline to file a proposed Protective Order. The Motion seeks a one week extension of time from July 30, 2020 to August 6, 2020.

In support thereof, the parties state that they have been working on this item, and anticipate that additional time will help the parties reach agreements so as to avoid the need for the Court to resolve disputes with respect to certain provisions to be included in the proposed Protective Order. In addition, the extension requested by this Motion will not cause a material delay in this action. Further, granting this extension will not cause any prejudice to any party or affect any other deadline. Finally, all parties have agreed to this extension request.

WHEREFORE, the Parties respectfully request that the Court grant this Motion to extend the time to file a protective order to August 6, 2020.

Dated: July 30, 2020

Respectfully submitted,

/s/ Kevin Gannon

Paul J. Hayes (BBO #227000)
Matthew D. Vella (BBO #660171)
Kevin Gannon (BBO #640931)
Daniel McGonagle (BBO #690084)
Alex Breger (BBO #685537)
Michael J. Ercolini (*pro hac vice*)
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Tel: (617) 456-8000
Email: phayes@princelobel.com
Email: mvella@princelobel.com
Email: kgannon@princelobel.com
Email: dmgonagle@princelobel.com
Email: abreger@princelobel.com
Email: mercolini@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

/s/ Gregory F. Corbett

Gregory F. Corbett (BBO No. 646394)
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
617.646.8000 Phone
617.646.8646 Fax
gcorbett@wolfgreenfield.com

ATTORNEY FOR THE DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Kevin Gannon